

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MELODY RUSSELL
P.O. Box 35
Glen Burnie, MD 21060

Plaintiff,

Civil Action No.: 8:21-cv-2129

v.

**GENERAL DYNAMICS
INFORMATION TECHNOLOGY**
3150 Fairview Park Drive
Falls Church, VA 22042

Defendant.

COMPLAINT

Plaintiff Melody Russell, for her complaint General Dynamics Information Technology, Inc. (hereinafter “GDIT”), and respectively avers as follows:

PARTIES

1. Plaintiff Melody Russell is a resident of the state of Maryland.
2. Defendant General Dynamics Information Technology is a business principally based in state of Virginia.

JURISDICTION AND VENUE

3. This Court has jurisdiction over Plaintiff’s claims under 28 U.S.C. § 1331 and 1332.
4. Venue is proper under 28 U.S.C. § 1391(b) because Defendant conducts business and can be found in this judicial district.
5. The events giving rise to the claims in this action occurred in this judicial district.
6. Plaintiff has exhausted all administrative remedies with the Equal Employment Opportunity Commission and is in possession of a Notice of Right to Sue.

FACTUAL BACKGROUND

7. GDIT is company that supports complex government, defense, and intelligence projects in the United States.
8. Melody Russell was offered a position as a Cyber Security Analyst for GDIT on March 17, 2020. At all times herein, Russell maintained her office in this Maryland judicial district and was assigned to work remotely for GDIT in Maryland. Russell was paid \$75,000.00 annually.
9. While at GDIT, Russell was supervised by Urvashi Zwa and her Program Manager was Mark Sieg.
10. On behalf of GDIT, Russell was assigned to work on a contract with GDIT's contractor VariQ.
11. Throughout Plaintiff's time with Defendant, and working on the VariQ contract for Defendant, she maintained a satisfactory job performance.
12. On February 14, 2021, Russell complained about discrimination to Sieg. Specifically, on February 14, 2021, Russell sent an elaborate twenty-one-page letter to Sieg titled "**Complaints of Bias and Discrimination against Muhammad Mian**." Mian was an employee for VariQ and oversaw the contract that Russell was assigned to on work for GDIT.
13. Within the letter to Sieg, Russell complained that Mian "engaged in acts of discrimination" based on sex, religion, and disability. Russell also alleged that another employee named "Mr. Mazher" was treated more favorably than her based on sex and religion.
14. On February 26, 2021, Sieg followed up with Russell and acknowledged the February 14, 2021 letter.
15. On February 26, 2021, Sieg requested a meeting with Russell. Present during the meeting was Sieg and Zwa.

16. During the meeting, Sieg became a different person. He started accusing Russell of trivial issues like not getting a “Personal Identity Verification Card.” But during the meeting, Zwa also stated that “[VariQ] [is] the customer and [Mazher] is a man and what they said goes.”
17. In February 2021, Russell got a call from GDIT’s human resources official Maureen Birnbaum. She indicated that she would be investigating her complaint of discrimination against VariQ. Two other human resources officials, Jennifer Bunce and Anesha Seesay joined the investigation.
18. During a sit down discussion with Birnbaum, Bunce and Seesay, Russell repeated her allegations of discrimination made on February 14, 2021. The human resources team indicated that they would speak to VairQ about her complaint of discrimination. They also indicated that they would speak to Zwa and Sieg.
19. After the meeting, Russell noticed that her job position had been posted online. When Russell noticed her job position posted online, she asked Bunce whether it was “a replacement for [her] job.” Bunce stated that she was “unsure.”
20. Russell was issued a “Final Written Warning” from Zwa on March 3, 2021.
21. About two weeks later, Zwa issued a “Working Notice” to Russell on March 17, 2021. The provided Russell with a “two-week working notice” that her “employment with the company may terminated during or at the end of the working notice period....”
22. On March 31, 2021, Russell received notice from Birnbaum that she was terminated from GDIT.
23. After termination, GDIT replaced Russell’s position with a middle eastern male, believed to be Muslim. His name is Saad Abbas. Sieg and Mian were responsible for hiring Abbas.

CAUSES OF ACTION

Count 1: Retaliation: Title VII of the Civil Rights Act of 1964

24. Russell incorporates every preceding paragraph as alleged above.
25. Russell engaged in protected activity by complaining discrimination in the workplace.
26. Russell was terminated as a result of the protected activity.
27. WHEREFORE, Russell prays for nominal damages; compensatory damages, in an amount to be determined at trial; punitive damages, in an amount to be determined at trial; attorney's fees and the costs of this litigation; back pay, front pay, and future benefits, as may be appropriate; pre- and post-judgment interest; and any other relief the Court deems necessary and appropriate.

Count 2: Sex Discrimination: Title VII of the Civil Rights Act of 1964

28. Russell incorporates every preceding paragraph as alleged above.
29. Russell was a member of protected class.
30. Russell maintained satisfactory job performance while employed with Defendant. However, Plaintiff was terminated, despite the satisfactory employment.
31. Defendant's conduct amounts to direct evidence of sex discrimination against Russell. Further, circumstantial evidence of discrimination exists of discrimination.
32. WHEREFORE, Russell prays for nominal damages; compensatory damages, in an amount to be determined at trial; punitive damages, in an amount to be determined at trial; attorney's fees and the costs of this litigation; back pay, front pay, and future benefits, as may be appropriate; pre- and post-judgment interest; and any other relief the Court deems necessary and appropriate.

JURY DEMAND

PLAINTIFF DEMANDS TRIAL BY JURY

Dated: August 16, 2021

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